Filed: 9/3/2020 2:14 PM
Lynne Finley
District Clerk
Collin County, Texas
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NO. 417-53803-2020

IN THE INTEREST OF	§	**IN THE DISTRICT COURT**
	§	
S.L., J.L. AND L.L.	§	**417TH JUDICIAL DISTRICT**
	§	
CHILDREN	§	**COLLIN COUNTY, TEXAS**

MOTION FOR PROTECTIVE ORDER

Pursuant to Rule 192.6 of the Texas Rules of Civil Procedure, Petitioner/Father Michael Long files this *Motion for Protective Order* and would respectfully show the Court as follows:

1. This is a suit to modify the parent-child relationship filed by Petitioner/Father, Michael Long on July 28, 2020.

2. On August 10, 2020, Respondent/Mother served Mr. Long with Requests for Disclosure, Written Interrogatories, Requests for Production, and Requests for Admissions.

3. The deadline for Mr. Long to provide responses is September 9, 2020.

4. Mr. Long has recently retained the undersigned counsel. In addition, due to numerous so-called "emergency" motions filed by Ms. Long and the former Amicus attorney, Mr. Long has not had sufficient time to work with his prior nor newly retained counsel and prepare responses.

5. Petitioner/Father objects to the time and place of discovery. A reasonable time for discovery is September 30, 2020.

6. On September 3, 2020, counsel for Mr. Long conferred with counsel for Ms. Long requesting a short extension of the discovery deadline by agreement. Ms. Long's counsel declined to accommodate the request, necessitating this motion and court intervention.

7. Mr. Long prays the Court grant this Motion and issue a protective order that the discovery requests not be undertaken at the time and place specified. Mr. Long prays the Court grant an order extending the discovery deadline to September 30, 2020.

8. This request is not sought for the purpose of delay, but so that justice may be served.

Respectfully submitted,

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Certificate of Conference

I certify that the undersigned counsel for Movant and counsel for Respondent have personally conducted a conference at which there was a substantive discussion of the issues raised in this motion and despite best efforts the counsel have not been able to revolve those matters presented.

By: /s/ Jamie L. Graham
Jamie L. Graham
Erin L. Groce
Sarah Anne Lishman
Attorneys for **MICHAEL LONG**

Certificate of Service

This is to certify that, pursuant to Rule 21 of the Texas Rules of Civil Procedure, a true and correct copy of the foregoing document has been served upon the below-named individual in the following manner as prescribed by Rule 21(a) of the Texas Rules of Civil Procedure on this the 3rd day of September, 2020.

____ Hand Delivery ____ Federal Express ____ Certified Mail, Return Receipt Requested
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By: /s/ Jamie L. Graham
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Automated Certificate of eService

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Lisa Salinas on behalf of Jamie Graham
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Associated Case Party: Michael Long

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Associated Case Party: Kelly Long

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